IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

THOMSON REU	TERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
	Plaintiffs and)	
	Counterdefendants,)	
)	
v.)	C.A. No. 20-613 (SB)
)	
ROSS INTELLIGENCE INC.,)	
)	
	Defendant and)	
	Counterclaimant.)	

PLAINTIFF AND COUNTERDEFENDANT'S MOTION FOR A LIMITED EXEMPTION FROM THE STANDING ORDER REGARDING PERSONAL ELECTRONIC DEVICES

Plaintiffs and Counterdefendants Thomson Reuters Enterprise Center GmbH and West Publishing Corporation ("Thomson Reuters") hereby moves for an order to exempt Dale Cendali, Yungmoon Chang, Eric Loverro, Miranda Means and Joshua Simmons from the District of Delaware's May 17, 2024 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the "May 17, 2024 Standing Order"). In support of this Motion, Thomson Reuters states as follows:

- 1. The District of Delaware's May 17, 2024 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require, *inter alia*, for visitors to place personal electronic devices in a locked pouch. Paragraph 4 of the May 17, 2024 Standing Order provides for certain exemptions to the Standing Order.
 - 2. A pretrial conference is scheduled in this case for August 6, 2024 in Courtroom 2B.

3. Thomson Reuters requests Dale Cendali, Yungmoon Chang, Eric Loverro, Miranda Means and Joshua Simmons, co-lead counsel, be allowed to bring their electronic devices into the courtroom for use during the pretrial conference. Ms. Cendali, Ms. Chang, Mr. Loverro, Ms. Means and Mr. Simmons have been admitted *pro hac vice* in this matter, but do not have access to a state-issued bar card.

WHEREFORE, Thomson Reuters respectfully requests that the Court issue an order to exempt Ms. Cendali, Ms. Chang, Mr. Loverro, Ms. Means and Mr. Simmons from the May 17, 2024 Standing Order.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

Jack B. Blumenfeld (#1014) Michael J. Flynn (#5333) 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899 (302) 658-9200 jblumenfeld@morrisnichols.com mflynn@morrisnichols.com

Attorneys for Plaintiffs and Counterdefendants Thomson Reuters Enterprise Center GmbH and West Publishing Corporation

OF COUNSEL:

Dale M. Cendali Joshua L. Simmons Eric A. Loverro KIRKLAND & ELLIS LLP 601 Lexington Avenue New York, NY 10022 (212) 446-4800

Miranda D. Means KIRKLAND & ELLIS LLP 200 Clarendon Street Boston, MA 02116 (617) 385-7500 Daniel E. Laytin, P.C. Christa C. Cottrell, P.C. Alyssa C. Kalisky Cameron Ginder Vanessa Barsanti Danielle O'Neal Jonathan Emmanuel Lexi Wung Erin Bishop Max Samels KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, IL 60654 (312) 862-2000

July 31, 2024

IT IS SO ORDERED this 1st day of August, 2024.

The Hon. Stephanos Bibas